UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN MILWAUKEE DIVISION

CATHERINE OKORO,

Plaintiff, Civil Action No.: 2:11-CV-00267

٧.

PYRAMID 4 AEGIS and JEROME BATTLES,

Defendant.

PLAINTIFF'S MOTION IN LIMINIE Bar Defendants from Referencing Any Personal Relationship Between Plaintiff and Defendant Battles

Plaintiff, Catherine Okoro, moves *in limine* to bar Defendants from testifying about or making any reference to any personal relationship that existed between Ms. Okoro and Mr. Battles. This includes, but is not limited to, any testimony that Ms. Okoro worked for Defendants because she was in a relationship with Mr. Battles, that Ms. Okoro did not intend to be paid for her work because of her relationship with Mr. Battles, or that she brought this action out of jealousy or anger from their relationship breaking up.

The grounds for this motion are undue prejudice, juror confusion, and waste of time. (Federal Rule of Evidence 403) Arguments of this type are highly prejudicial and improper. It is even more so in this case where liability has already been established and the only issue for trial is the number of hours Ms. Okoro worked for Defendants.

Wherefore, Plaintiff respectfully requests that Defendants be barred from referring in any way to any personal relationship that once existed between Mr. Battles and Ms. Okoro.

Dated this 13th day of August, 2012.

s/Rebecca L. Salawdeh

Rebecca L. Salawdeh (SBN 1067066) Salawdeh Law Office, LLC 7119 West North Avenue Wauwatosa, WI 53213

Telephone: 414-455-0117 Facsimile: 414-918-4517

Email: rebecca@salawdehlaw.com